

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
:
Gloria Harley :
: Case No. 18-15508-DJB
Debtor(s) :
:
:

**STANDING CHAPTER 13 TRUSTEE'S MOTION
FOR ALTERNATIVE DISBURSEMENT**

Kenneth E. West, Esquire, Standing Chapter 13 Trustee, by and through his counsel, requests that the Court authorize disbursement of certain funds to creditors (or the Debtor) for the following reasons:

1. Debtor filed the above-captioned Chapter 13 case, including a Chapter 13 Plan on August 20, 2018.
2. The Debtor's Plan ("Plan") sets forth the following order of distribution of payments:

Level 1: Trustee's Commissions
Level 2: Domestic Support Obligations
Level 3: Adequate Protection Payments
Level 4: Debtor's attorney's fees
Level 5: Priority claims, pro rata
Level 6: Secured claims, pro rata
Level 7: Specially classified unsecured claims
Level 8: General unsecured claims
Level 9: Untimely filed general unsecured non-priority claims to which debtor has not objected.

See Plan, Section 8: Order of Distribution.
3. The Debtor's Modified Plan (Docket #66) proposed for the Trustee to pay Debtor's counsel a fee in the amount of \$4,000.00 plus a supplemental fee in the amount of \$3,500.00 for a total of \$7,500.00 in counsel fees. These amounts are subject to approval in accordance with 11 U.S.C. §330 and Bankruptcy Rule 2016.
4. Debtor's counsel has not sought court approval of \$3,500.00 supplemental fee and has failed to file a Fee Application in accordance with 11 U.S.C. §330.

5. The Trustee retains the amount of \$3,500.00 for Debtor's counsel's fees, which could be used to pay remaining unpaid creditors.
6. Debtor has completed making plan payments to date.
7. As Debtor's counsel has not filed a Supplemental Fee Application, the Chapter 13 Trustee requests this Court authorize the Trustee to disburse the funds reserved for Debtor's counsel to the remaining unpaid creditors and the Debtor in accordance with the terms of the Plan.

WHEREFORE, Kenneth E. West, Esquire, Chapter 13 Standing Trustee, respectfully requests that this Court enter an Order in the form annexed hereto, authorizing the disbursement of funds reserved for Debtor's counsel to the remaining unpaid creditors in accordance with the terms of the Plan and the disbursement of any remaining funds directly to the Debtor.

Dated: June 30, 2025

/s/ Kenneth E. West, Esq.
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